



Stefanie Lambert <attorneystefanielambert@gmail.com>

---

## Whitmer v. King

---

Stefanie Lambert <attorneystefanielambert@gmail.com>

Fri, Jan 15, 2021 at 1:18 PM

To: Drew Paterson <aap43@outlook.com>

Bcc: Howard Kleinhendler <howard@kleinhendler.com>, Jesse Binnall <jbinnall@harveybinnall.com>

Dear Counsel,

As you may know, yesterday we filed a notice of dismissal as to the other parties in this case. As your client filed an answer, we will need to file a motion for voluntary dismissal pursuant to FRCP 41. Do you consent to such a motion?

Sincerely,

Stefanie Lambert Junttila

Counsel,

I will need time to confer with my client, but I know that an award of attorney fees and costs would have to be considered in order for my client to consent to your motion. As you are aware, the Court rule allows the district judge to award attorney fees and costs in consideration of a motion to voluntarily dismiss a case. Would you be inclined to agree to pay my client's attorney's fees and costs? Please advise. Also, later today, I will be sending you the proposed counterclaim for you to review and consider.

Drew Paterson  
(248) 568-9712  
aap43@outlook.com

---

**From:** Stefanie Lambert <attorneystefanielambert@gmail.com>  
**Sent:** Friday, January 15, 2021 1:18 PM  
**To:** Drew Paterson <aap43@outlook.com>  
**Subject:** Whitmer v. King

Dear Counsel,

As you may know, yesterday we filed a notice of dismissal as to the other parties in this case. As your client filed an answer, we will need to file a motion for voluntary dismissal pursuant to FRCP 41. Do you consent to such a motion?

Sincerely,

Stefanie Lambert Junttila



Stefanie Lambert <attorneystefanielambert@gmail.com>

---

## Whitmer v. King

---

Stefanie Lambert <attorneystefanielambert@gmail.com>

Fri, Jan 15, 2021 at 1:53 PM

To: Drew Paterson <aap43@outlook.com>

Bcc: Jesse Binnall <jbinnall@harveybinnall.com>, Howard Kleinhendler <howard@kleinhendler.com>

Counsel,

We do not agree to pay attorney fees and costs.

Sincerely,

Stefanie

[Quoted text hidden]



---

## Whitmer v. King

---

Drew Paterson <aap43@outlook.com>

Fri, Jan 15, 2021 at 2:44 PM

To: Stefanie Lambert <attorneystefanielambert@gmail.com>

Counsel,

In addition to the payment of attorney's fees and costs, the dismissal would have to be "with" prejudice.

Drew Paterson

(248) 568-9712

aap43@outlook.com

---

**From:** Drew Paterson <aap43@outlook.com>

**Sent:** Friday, January 15, 2021 1:57 PM

**To:** Stefanie Lambert <attorneystefanielambert@gmail.com>

**Subject:** Re: Whitmer v. King

Counsel,

Respectfully, my client will not consent to the voluntary dismissal of the case without the payment of attorney fees. Thus, we will leave it to the Judge to determine whether the payment of attorney fees will be part of the terms to allow for the voluntary dismissal of your complaint and whether she will allow the filing of the counterclaim against your clients.

Drew Paterson

(248) 568-9712

aap43@outlook.com

---

**From:** Stefanie Lambert <attorneystefanielambert@gmail.com>

**Sent:** Friday, January 15, 2021 1:53 PM

**To:** Drew Paterson <aap43@outlook.com>

**Subject:** Re: Whitmer v. King

Counsel,

We do not agree to pay attorney fees and costs.

Sincerely,

Stefanie